

217-782-5504

May 8, 2003



Mr. Ronald B. St. John, PG
Clayton Group Services, Inc.
3140 Finley Road
Downers Grove, IL 60515

Refer to: 0430555004 – DuPage County
Lisle/Lockformer
Superfund/Technical Reports

Dear Mr. St. John:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed Clayton's Technical Memorandum *Confirmation Sampling Plan for Areas 1, 2 and Former Degreaser Area, April 17, 2003*, prepared by Clayton Group Services for the Lockformer site. We have the following comments:

1. Page 2, Illinois EPA notes that performing the confirmation sampling prematurely is not in the interests of any of the parties. Rigidly defining the asymptotic concentration drop as two consecutive measurements within 80 percent of each other would include cases where consistently high effluent concentrations are observed (near the beginning of the treatment duration, for example). Please refine the definition of asymptotic to avoid this inconsistency.
2. Page 2, The "theoretical electrical energy input" for each of the sub-areas is not well-defined.
3. Figure 1, Three additional confirmation soil borings are needed in the southern portion of the former vapor degreaser area. (See Figure 1)
4. Figure 1, Additional confirmation soil borings are needed around the perimeter of Areas 1 and 2 in several locations. (See Figure 1)
5. Page 5, In the event that a sub-area fails the confirmation sampling, and requires additional heating, an additional confirmation sampling plan will need to be developed in conjunction with USEPA and Illinois EPA that adequately addresses the sampling locations which originally failed. The sampling plan may be less stringent than the current plan for each area, depending on area-specific data.

6. Page 5, It is stated that two to four locations adjacent to a sub-area boundary will be sampled to verify that vapor migration has not occurred. No discussion is given as to how these sample results will be analyzed. Please provide such a discussion; also, please note that the objective of this data analysis (determining whether vapor migration has adversely impacted a previously-remediated sub-area) is different than the objective of the confirmation sampling (determining whether representative soils from a given area meet the respective RAOs).

I look forward to discussing these comments with you and USEPA at our meeting on Monday May 12, 2003.

Sincerely,

Stanley F. Komperda
State Sites Unit
Remedial Project Management Section
Bureau of Land

Cc: Howard Chinn, IAGO-Chicago
Steve Faryan, USPEA-Region V

